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13 Attorneys for Defendants KIM SOFFE, COLLIN PETRIELIUS and NAPHCARE, INC.

14 **UNITED STATES DISTRICT COURT**

15 **DISTRICT OF NEVADA**

16 CRAIG FARAH, Personal Representative of the  
17 ESTATE OF NICHOLAS FARAH,

18 Plaintiffs,

19 vs.

20 LAS VEGAS METROPOLITAN POLICE  
21 DEPARTMENT; RICHARD NEWMAN;  
22 SAMUEL MENDOZA; AARON MOSELY;  
23 JEREMEY STEWART; CHRISTY SNAPP;  
24 GABRIEL VILLANUEVA; KIM SOFFE; COLLIN  
25 PETRIELIUS and NAPHCARE, INC.

26 Defendants.

CASE NO.: 2:20-cv-00604-RFB-VCF

STIPULATION AND [PROPOSED] ORDER TO  
EXTEND DISCOVERY AND EXPERT  
DISCLOSURE DATES

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**STIPULATION TO EXTEND SCHEDULED DEADLINES**

**(FIRST REQUEST)**

Pursuant to LR7-1 and LR 26-3, the parties, by and through their respective counsel of record, hereby stipulate and request this Court extend the Discovery Deadlines in the above captioned case for one hundred twenty (120) days and the Expert Disclosure date be extended to March 29, 2021. In support of this Stipulation and Request, the parties state as follows:

**A. DISCOVERY COMPLETED TO DATE:**

1. Plaintiffs' Initial Disclosures;
2. Plaintiffs' Interrogatories, Request for Production and Request for Admissions to Defendants;
3. Defendants' Initial Disclosures;

**B. DISCOVERY REMAINING TO BE COMPLETED**

1. Deposition of Plaintiff;
2. Depositions of individually named Defendants;
3. Depositions of Plaintiff's and Decedent's treating medical providers;
4. Initial expert and rebuttal expert disclosures;
5. Depositions of additional witnesses (as needed).

**C. REASON FOR REQUEST FOR EXTENSION OF DISCOVERY DEADLINES**

The parties have been diligent in completing discovery. This is a complex case involving the death of a detainee at Clark County Detention Center. There are 10 named defendants and 10 causes of action alleged. Defendant NaphCare, Inc. was only recently served and appeared for the first time on October 29, 2020 when it timely filed its responsive pleading. The parties need additional time to complete additional discovery, including the depositions of Plaintiff, the multiple individually named Defendants and other witnesses prior to the disclosure of experts. This stipulation to extend deadlines is made in good faith without any intent to delay this matter.

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**D. PROPOSED SCHEDULE FOR COMPLETING DISCOVERY**

1. Close of Discovery shall be extended from Friday, February 26, 2021 to **Monday, June 28, 2021.**
2. The deadline to file Motions to Amend the Pleadings or to Add Parties shall be extended from Monday, November 30, 2020 to **Tuesday, March 30, 2021.**
3. The deadline for Initial Expert Disclosures, in accordance with Fed.R.Civ.P 26(a)(2) and LR 26-1(e)(3), shall be extended from Monday, December 28, 2020 to **Tuesday, April 27, 2021.**
4. The deadline for Rebuttal Expert Disclosures shall be extended from Wednesday, January 27, 2020 to **Thursday, May 21, 2021.**
5. The deadline for filing Dispositive Motions shall be extended from Monday, March 29, 2021 to **Tuesday, July 27, 2021.**
6. The deadline for the Joint Pre-Trial Order shall be extended from Wednesday, April 28, 2020 to **Thursday, August 26, 2021.** This deadline will be suspended if dispositive motions are timely filed, until 30 days after the decision of the dispositive motions or until further order of the Court.

**E. GOOD CAUSE FOR MAKING REQUEST WITHIN 21 DAYS OF DEADLINE**

The parties understand that this Request for the Extension of Scheduled Deadlines is being made within 21 days of the deadline to file Motions to Amend the Pleadings or to Add Parties currently set for November 30, 2020. Good cause exists for making this request at this time as Defendant NaphCare, Inc. appeared in this case for the first time on October 29, 2020. Defendant NaphCare, Inc. did not participate in the Rule 26(f) conference and did not agree to the current discovery deadlines. Once counsel for Defendant NaphCare, Inc. learned of the current discovery deadlines it immediately prepared the instant Stipulation and Order and sent it to other counsel for approval.

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DATED this 23<sup>rd</sup> day of November 2020

**LOEVY & LOEVY**

/s/ Sarah Grady, Esq.  
 SARAH GRADY, ESQ.  
 311 N. Aberdeen Street, 3<sup>rd</sup> Floor  
 Chicago, IL 60607  
*Attorneys for Plaintiff, Craig Farah, personal  
 representative of The Estate of Nicolas Farah*

Dated this 23<sup>rd</sup> day of November, 2020

**MARQUIS AURBACH COFFING**

/s/ Craig R. Anderson, Esq.  
 CRAIG R. ANDERSON, ESQ. – Bar No. 6882  
 100001 Park Run Drive  
 Las Vegas, NV 89145  
*Attorneys for Las Vegas Metro Police  
 Department; Richard Newman; Samuel  
 Mendoza; Aaron Mosely; Jeremy Stewart;  
 Christy Snapp; Gabriel Villanueva*

DATED this 23<sup>rd</sup> day of November, 2020

**LAURIA TOKUNAGA GATES & LINN, LLP**

/s/ Paul A. Cardinale, Esq.  
 PAUL A. CARDINALE, ESQ. – Bar No. 8394  
 1755 Creekside Oaks Drive, Suite #240  
 Sacramento, CA 95833  
 Southern Nevada Office:  
 601 South Seventh Street  
 Las Vegas, Nevada 89101  
*Attorneys for Defendants Kim Soffe, Collin  
 Petrieli and NaphCare, INC.*

**IT IS SO ORDERED** that the instant Stipulation to Extend Discovery and Expert Disclosures  
 Dates is **GRANTED** and the discovery deadlines shall be amended as follows:

Close of Discovery:	June 26, 2021
Last Day to Amend Pleadings and Add Parties:	March 30, 2021
Initial Expert Designation:	April 27, 2021
Rebuttal Expert Designation:	May 21, 2021
Last Day for Dispositive Motions:	July 27, 2021
Joint Pre-Trial Order	August 26, 2021

If dispositive motions  
 are filed, the deadline  
 for filing the joint  
 pretrial order will be  
 suspended until 30  
 days after  
 decision on the  
 dispositive motions  
 or further court order.

  
 UNITED STATES MAGISTRATE JUDGE

DATED: 11-23-2020

## Cheyenne Allmaras

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**From:** Paul A. Cardinale  
**Sent:** Monday, November 23, 2020 1:53 PM  
**To:** Cheyenne Allmaras  
**Subject:** FW: Farah--Stip and Order to Extend Deadlines



**Paul A. Cardinale**

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**From:** Sarah Grady <[sarah@loevy.com](mailto:sarah@loevy.com)>  
**Sent:** Monday, November 23, 2020 1:37 PM  
**To:** Paul A. Cardinale <[pcardinale@ltglaw.net](mailto:pcardinale@ltglaw.net)>  
**Cc:** Craig Anderson <[canderson@maclaw.com](mailto:canderson@maclaw.com)>; Liesa M. Costa <[lcosta@ltglaw.net](mailto:lcosta@ltglaw.net)>; David B. Owens <[david@loevy.com](mailto:david@loevy.com)>; Sherri Mong <[SMong@maclaw.com](mailto:SMong@maclaw.com)>; Leah Dell <[LDell@maclaw.com](mailto:LDell@maclaw.com)>  
**Subject:** Re: Farah--Stip and Order to Extend Deadlines

This is fine with me. Thanks.

Sarah C. Grady  
**LOEVY & LOEVY**  
311 North Aberdeen, 3rd Floor  
Chicago, Illinois 60607  
Phone: 312.243.5900  
Email: [sarah@loevy.com](mailto:sarah@loevy.com)  
Pronouns: she/her

On Mon, Nov 23, 2020 at 1:31 PM Paul A. Cardinale <[pcardinale@ltglaw.net](mailto:pcardinale@ltglaw.net)> wrote:

Thanks Craig. Sarah are you able to let me know today if I can affix your signature on this stipulation to continue?

Thank you,



**Paul A. Cardinale**

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---

**From:** Craig Anderson <[canderson@maclaw.com](mailto:canderson@maclaw.com)>

**Sent:** Friday, November 20, 2020 4:32 PM

**To:** Paul A. Cardinale <[pcardinale@ltglaw.net](mailto:pcardinale@ltglaw.net)>; Sarah Grady <[sarah@loevy.com](mailto:sarah@loevy.com)>

**Cc:** Liesa M. Costa <[lcosta@ltglaw.net](mailto:lcosta@ltglaw.net)>; David B. Owens <[david@loevy.com](mailto:david@loevy.com)>; Sherri Mong <[SMong@maclaw.com](mailto:SMong@maclaw.com)>;

Leah Dell <[LDell@maclaw.com](mailto:LDell@maclaw.com)>

**Subject:** RE: Farah--Stip and Order to Extend Deadlines

I'm good with this. You can use my signature.



**Craig R. Anderson, Esq.**

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**From:** Paul A. Cardinale <[pcardinale@ltglaw.net](mailto:pcardinale@ltglaw.net)>

**Sent:** Friday, November 20, 2020 1:15 PM

**To:** Sarah Grady <[sarah@loevy.com](mailto:sarah@loevy.com)>; Craig Anderson <[canderson@maclaw.com](mailto:canderson@maclaw.com)>

**Cc:** Liesa M. Costa <[lcosta@ltglaw.net](mailto:lcosta@ltglaw.net)>; David B. Owens <[david@loevy.com](mailto:david@loevy.com)>; Sherri Mong <[SMong@maclaw.com](mailto:SMong@maclaw.com)>;

Leah Dell <[LDell@maclaw.com](mailto:LDell@maclaw.com)>

**Subject:** [External] Farah--Stip and Order to Extend Deadlines

**Importance:** High

Sarah and Craig:

I have attached the Proposed Stip and Order to extend deadlines in this case. Please let me know if you approve it as soon as you are able. I am hoping to submit it to the Court on Monday since the current deadline to Amend Pleadings and Add Parties is November 30. If we submit the S&O after that date, I/we have to show excusable neglect as to why the S&O was not submitted before the deadline.

Thank you,



**Paul A. Cardinale**

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